



REEDER MCCREARY

LLP

July 6, 2023

The Honorable Louis L. Stanton
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St., New York, NY 10007-1312

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, Case No. 22 Civ 2435 (LLS) (SN)

Dear Judge Stanton:

We write on behalf of Plaintiff, Lynne Freeman (“Freeman”) regarding Defendants’ opposition filed yesterday (ECF 244) at 8:06 p.m. (EDT) to Freeman’s Motion for Reconsideration (ECF 224). Pursuant to Local Civil Rules 6.3 and 6.1(b)(3), Freeman has seven days from yesterday to file her reply.

The motion papers were prepared by my co-counsel Stephen Doniger. Stephen is out of the Country on a vacation that was planned months ago. He is scheduled to return to his office on July 11, 2023. Thus, we respectfully request that Freeman have to and including July 18, 2023 (a six-day extension) to file her reply papers.

I am unable to prepare the papers in Mr. Doniger’s absense because I have numerous deadlines and commitments in other matters over the next six days. Moreover, I am not as familiar with the issues as Mr. Doniger since he wrote the moving papers.

Defendants advised me that they do not object to Plaintiff’s extension request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

CSReeder, PC

A handwritten signature in blue ink, appearing to read 'Mark D. Passin', with a large, sweeping initial 'M'.

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cc: All counsel of record (via ECF)